

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

DAVID J. CATANZARO,	:	Civil Case No. 3:22-CV-01754-
	:	JFS-DFB
Plaintiffs	:	(Judge Joseph F. Saporito Jr.)
	:	(Referred to Judge Phillip J.
v.	:	Caraballo)
	:	
LYKART TECHNOLOGIES LLC,	:	
ET AL.,	:	
	:	
Defendants.	:	
	:	

**UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO
PLAINTIFF’S COMPLAINT**

Defendants Apple Inc., Google LLC, YouTube LLC, Microsoft Corporation, Inc., Mozilla Corporation, Poshmark Inc., and Target Corporation (collectively “Moving Defendants”) respectfully request the Court grant this motion to extend their time to respond to Plaintiff’s Fifth Amended Complaint.

WHEREAS, on March 13, 2025, the Court granted the Unopposed Motion for Extension of Time to File Answer of Target Corporation, extending Target’s time to respond to April 16, 2025 (Docket No. 61);

WHEREAS, on March 17, 2025, the Court granted the Joint Motion for Extension of Time to Respond and Regarding Motions for Leave to Amend, extending Google LLC’s and YouTube LLC’s time to respond to May 1, 2025 (Docket No. 66);

WHEREAS, on March 17, 2025, the Court granted the Unopposed Motion for Extension of Time to File Answer of Mozilla Corporation, extending Mozilla's time to respond to April 21, 2025 (Docket No. 67);

WHEREAS, on March 17, 2025, the Court granted the Consent Motion for Extension of Time to Respond to Plaintiff's Operative Complaint of Poshmark Inc., extending Poshmark's time to respond to April 21, 2025 (Docket No. 67);

WHEREAS, on March 19, 2025, the Court granted the Unopposed Motion for Extension of Time to File Answer of Apple Inc., extending Apple's time to respond to May 1, 2025 (Docket No. 80);

WHEREAS, on March 19, 2025, the Court granted the Unopposed Motion for Extension of Time to Respond of Microsoft Corporation, extending Microsoft's time to respond to April 25, 2025 (Docket No. 79);

WHEREAS, on April 1, 2025, Plaintiff filed a Motion to Stay Proceedings Pending Ruling in Related Case (Docket No. 89);

WHEREAS, on April 9, 2025, the Moving Defendants filed a Notice of Non-Opposition to Plaintiff's Motion to Stay (Docket No. 91);

WHEREAS, the Moving Defendants believe that the Court and all parties would benefit if they submit Rule 12 responses to the complaint at the same time, rather than on individual schedules;

NOW, THEREFORE, in support of this Unopposed Motion, Moving Defendants state as follows:

1. Moving Defendants are diligently investigating Plaintiff's allegations and continue to do so while the Court considers Plaintiff's pending motion to stay this action.

2. Moving Defendants respectfully request the Court order that the time for each of them to file any Rule 12 response to the Fifth Amended Complaint be set for the later of:

- 30 days after the Court's order denying Plaintiff's Motion to Stay Proceedings Pending Ruling in a Related Case, Docket No. 89, or
- 30 days after any stay is lifted, if the Court grants one.

3. Plaintiff does not oppose this request for extension.

4. Because Plaintiff concurs in this request and the reasons for the request are set forth in the body of this motion, no supporting brief is required pursuant to Middle District Local Rule 7.5.

5. No party will be prejudiced by this Court granting an extension, and this motion is not being filed for purposes of harassment or delay.

Date: April 9, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of April, 2025, a copy of the foregoing Unopposed Motion To Extend Time To Respond To Plaintiff's Complaint was served on all counsel of record via ECF and served on plaintiff via email.

/s/ John V. Gorman

John V. Gorman